

EXHIBIT S

2016-004750
GF-C. Depoian
1

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELIEZER LOPEZ and SUHAIL
LAUREANO,

Plaintiffs,

vs.

CITY OF NEW YORK, LUIS LINARES,
LUIS ANGELES, and JOHN DOES #1-3

Defendants.

Index No.
17 CV
00181
(LAP)

July 13, 2018

10:05 a.m.

Deposition of STEVEN ALFANO, held at the
offices of Emery Celli Brinckerhoff & Abady
LLP, 600 Fifth Avenue, New York, New York,
pursuant to Notice, before Jeremy Frank, a
Notary Public of the State of New York.

HUDSON REPORTING & VIDEO

1-800-310-1769

New York
Connecticut

Hudson Reporting and Video
Nationwide 1-800-310-1769

New Jersey
Pennsylvania

ORIGINAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A P P E A R A N C E S:

EMERY CELLI BRINCKERHOFF & ABADY LLP

Attorneys for Plaintiffs

600 Fifth Avenue, 10th Floor

New York, NY 10020

BY: ALI FRICK, ESQ.

AFrick@ecbalaw.com

EARL WARD, ESQ.

EWard@ecbalaw.com

(212) 763-5000

NEW YORK CITY LAW DEPARTMENT

Office of the Corporation Counsel

Attorneys for Defendants

100 Church Street

New York, NY 10007

BY: RACHEL SELIGMAN, ESQ.

RSeligma@law.nyc.gov

CAROLYN K. DEPOIAN, ESQ.

CDepoian@law.nyc.gov

(212) 356-2358

(Appearances continued)

NYC LAW DEPARTMENT
CORPORATION COUNSEL
RECEIVED BY MAIL
2018 AUG -6
A 9:51

1

2 A P P E A R A N C E S (continued)

3

4

NEW YORK POLICE DEPARTMENT

5

Attorneys for Defendants

6

One Police Plaza

7

New York, NY 10038

8

BY: MICHAEL PUMA, ESQ.

9

Michael.puma@nypd.org

10

(646) 610-5825

11

12

ALSO PRESENT:

13

WILLIAM GOSLING

14

15

16

17

18

19

20

21

22

23

24

25

1 Alfano

2 A. Yes.

3 Q. How often?

4 A. Whenever they put in a class, it
5 could vary.

6 Q. In a typical year how many times
7 do you give the instruction for the class?

8 A. Could be from one to maybe three
9 times, four times.

10 Q. Have you taught any class this
11 year yet in 2018?

12 A. I believe I have taught one or
13 two.

14 Q. How many years have you been
15 teaching?

16 A. I would say maybe three, four
17 years.

18 Q. What do you teach your subjects
19 about what investigative steps they should
20 take in investigating a level three incident?

21 A. Depicted by the type of incident.

22 Q. It is a level three incident.

23 A. Okay, well, there is different
24 sorts of level three incidents. There is ones
25 where people jump over a fence and there is no

1 Alfano

2 complainant. I mean if you have nobody making
3 a complaint, you try to get as much evidence
4 that is related to the incident that you
5 believe is necessary.

6 Q. Why do you make an investigation
7 if there's no nobody making a complaint?

8 A. Because this is how they determine
9 level three incidents and what they want to be
10 investigated due to the nature of their
11 injury.

12 Q. Who is they?

13 A. They is the NYPD.

14 Q. Why do they want you to
15 investigate level three incidents if there is
16 no complaint?

17 A. To try to discover how we got the
18 injury.

19 Q. To look for the truth, right?

20 A. Yes.

21 Q. So in all of your investigations
22 you're looking for the truth?

23 A. Of course.

24 Q. So it doesn't actually matter
25 whether there is a complaint or not; isn't